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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

CLARICE ROBINSON,
individually, and on behalf of other
members of the general public
similarly situated and as an
aggrieved employee pursuant to the
Private Attorney General Act
("PAGA"),

Plaintiff,

vs.

FEDERAL EXPRESS
CORPORATION, a Delaware
Corporation; FEDEX
CORPORATION, a Delaware
Corporation; and DOES 1 through
10, inclusive,

Defendants.

Case No. 2:19-cv-01281 MWF(SHKx)
[Assigned to Hon. Judge Michael W.
Fitzgerald]

CLASS ACTION COMPLAINT
NOTICE OF SETTLEMENT

Complaint Filed: November 28, 2018
Removal Date: February 21, 2019

1 **NOTICE OF SETTLEMENT**

2 Plaintiff Clarice Robinson (“Plaintiff”), by and through her respective
3 counsel, hereby submits this Notice of Settlement.

4 On July 14, 2021, the Parties attended a full-day mediation with Eleanor Barr
5 and reached an individual settlement resolving Plaintiff Clarice Robinson’s claims
6 only. In reaching a settlement for Plaintiff’s individual claims, Defendant has not
7 provided any consideration to Plaintiff for the dismissal of the class claims and no
8 settlement has been reached as to any part of the class claims alleged in this action.

9 The Parties have memorialized the terms of the settlement and fully executed
10 the settlement agreement. In light of the settlement, the Parties will request the Court
11 to dismiss this action in its entirety, with prejudice as to Plaintiff’s individual claims,
12 and without prejudice as to the class claims.

13 Plaintiff has provided Defendant with a draft Joint Stipulation re Dismissal
14 and [Proposed] Order Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii),
15 which Plaintiff anticipates filing within the next seven (7) days pending Defendant’s
16 approval.

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1 Dated: August 9, 2021

Respectfully submitted,

2 CAPSTONE LAW APC

3 By: /s/ Brandon Brouillette

4 Mark A. Ozzello

5 Brandon Brouillette

6 Joseph Hakakian

7 Attorneys for Plaintiff

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